

# **Exhibit 1**

**Samantha Tejera**

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**From:** Scott Burroughs <scott@donigerlawfirm.com>  
**Sent:** Thursday, April 16, 2020 1:35 PM  
**To:** Lindsay R. Edelstein; Laura Zaharia  
**Cc:** Nancy Wolff; Stephen Doniger  
**Subject:** Re: McGucken v. Newsweek

Nancy/Lindsay - we are going to seek leave to file a supplemental brief to address the recent opinion from Judge Wood. Will your office consent to this request? Please advise.

--

Scott Alan Burroughs, Esq.  
DONIGER / BURROUGHS  
231 Norman Avenue, Suite 413  
Brooklyn, New York 11222  
(310) 590-1820  
scott@donigerlawfirm.com

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**From:** Lindsay R. Edelstein <LEdelstein@cdas.com>  
**Sent:** Tuesday, March 24, 2020 4:28 PM  
**To:** Laura Zaharia <lzaharia@donigerlawfirm.com>  
**Cc:** Scott Burroughs <scott@donigerlawfirm.com>; Nancy Wolff <NWolff@cdas.com>  
**Subject:** RE: McGucken v. Newsweek

Hi Laura,

The attached letter looks good to file, except can you please change "Newsweek LLC" to "Newsweek Digital LLC" in the body of the letter, as the latter is its correct corporate name?

Regards,  
Lindsay

Lindsay Edelstein  
Cowan, DeBaets, Abrahams & Sheppard LLP  
tel: 212-974-7474  
[LEdelstein@cdas.com](mailto:LEdelstein@cdas.com)

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**From:** Laura Zaharia <lzaharia@donigerlawfirm.com>  
**Sent:** Tuesday, March 24, 2020 3:50 PM  
**To:** Lindsay R. Edelstein <LEdelstein@cdas.com>  
**Cc:** Scott Burroughs <scott@donigerlawfirm.com>; Nancy Wolff <NWolff@cdas.com>  
**Subject:** RE: McGucken v. Newsweek

Thanks Lindsay. Please see attached for the letter we plan to file later today and let us know if you have any objections.

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Laura M. Zaharia, Esq.  
DONIGER / BURROUGHS

231 Norman Avenue, Suite 413  
Brooklyn, New York 11222  
(310) 590-1820  
[lzaharia@donigerlawfirm.com](mailto:lzaharia@donigerlawfirm.com)

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**From:** Lindsay R. Edelstein <[LEdelstein@cdas.com](mailto:LEdelstein@cdas.com)>  
**Sent:** Tuesday, March 24, 2020 2:38 PM  
**To:** Laura Zaharia <[lzaharia@donigerlawfirm.com](mailto:lzaharia@donigerlawfirm.com)>; Nancy Wolff <[NWolff@cdas.com](mailto:NWolff@cdas.com)>  
**Cc:** Scott Burroughs <[scott@donigerlawfirm.com](mailto:scott@donigerlawfirm.com)>  
**Subject:** RE: McGucken v. Newsweek

Hi Laura,

Hope you are also doing well. We consent to the request.

Regards,  
Lindsay



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**From:** Laura Zaharia <[lzaharia@donigerlawfirm.com](mailto:lzaharia@donigerlawfirm.com)>  
**Sent:** Tuesday, March 24, 2020 12:54 PM  
**To:** Lindsay R. Edelstein <[LEdelstein@cdas.com](mailto:LEdelstein@cdas.com)>; Nancy Wolff <[NWolff@cdas.com](mailto:NWolff@cdas.com)>  
**Cc:** Scott Burroughs <[scott@donigerlawfirm.com](mailto:scott@donigerlawfirm.com)>  
**Subject:** McGucken v. Newsweek

Lindsay and Nancy,

I hope this email finds you both well. Given the unprecedented COVID-19 crisis, we will be seeking to extend the deadline to oppose Newsweek's motion to dismiss by two weeks. Please let us know if you consent to this request.

Regards,

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